

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

TYRONE HENDERSON,)	
on behalf of himself and others)	
similarly situated,)	
)	
Plaintiff,)	Case No. 3:12-cv-00109-REP
)	
v.)	
)	
INSTANT CHECKMATE LLC,)	
)	
Defendant.)	
)	

DEFENDANT INSTANT CHECKMATE LLC'S
MOTION TO DISMISS PLAINTIFF TYRONE HENDERSON'S COMPLAINT

Defendant INSTANT CHECKMATE LLC, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and Local Rule 7(f), moves this Court to dismiss the Complaint filed herein by Plaintiff TYRONE HENDERSON for the reasons stated in the accompanying Memorandum of Points and Authorities, which are incorporated by reference as though set forth fully herein.

Dated: April 13, 2012.

Respectfully submitted,

INSTANT CHECKMATE, LLC

By Counsel

/s/ Hanna Lee Blake

Hanna Lee Blake (VSB No. 70026)

Alexander N. Lamme (VSB No. 45553)

Counsel for Instant Checkmate LLC

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

8405 Greensboro Drive, Suite 100

McLean, Virginia 22102

Tel: (703) 749-1000

Fax: (703) 893-8029

Email: hblake@wthf.com

Email: alamme@wthf.com

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of April, 2012, I served a true and correct copy of the foregoing along with a Memorandum of Points and Authorities and a Proposed Order, via the Court's electronic filing ("CM/ECF") system and First Class U.S. Mail to:

Leonard A. Bennett (VSB No. 37523)
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Tel: (757) 930-3660
Fax: (757) 930-3662
Email: Lenbennett@clalegal.com

Counsel for Tyrone Henderson

/s/ Hanna Lee Blake

Hanna Lee Blake (VSB No. 70026)
Alexander N. Lamme (VSB No. 45553)
Counsel for Instant Checkmate LLC
WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.
8405 Greensboro Drive, Suite 100
McLean, Virginia 22102
Tel: (703) 749-1000
Fax: (703) 893-8029
Email: hblake@wthf.com
Email: alamme@wthf.com